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6 Attorneys for Defendant
7 **THE BOEING COMPANY, individually and as**
8 **successor by merger to McDONNELL DOUGLAS**
CORPORATION, successor by merger with
DOUGLAS AIRCRAFT COMPANY

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12
13 JOSEPH THRASH and CHEZ THRASH,

14 Plaintiffs,

15 vs.

16 CIRRUS ENTERPRISES, LLC, et al.,

17 Defendants.
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Case No. 3:17-cv-01501-JST

STIPULATION AND ~~PROPOSED~~
ORDER RE: DEPOSITIONS OF EXPERT
WITNESSES

1 Plaintiffs and defendants hereby stipulate as follows and request that the Court approve the
2 parties' stipulation regarding the depositions of expert witnesses:

3 1) Plaintiffs and defendants have stipulated that it is not necessary to subpoena the
4 opposing side's expert witnesses in this case. Any party who wants to take any opposing
5 party's expert deposition in person can do so near the expert's location at the noticing
6 party's expense.

7 2) Rather than having to serve a subpoena, a party may request dates of availability of an
8 opposing party's experts, and, within 48 hours of such request, the opposing party will
9 provide dates of their experts' availability for deposition. The requesting party may
10 subsequently serve a notice of deposition including requests for production of
11 documents at the deposition (subject to proper objections).

12 The filing party attests that all other signatories listed, and on whose behalf the filing is
13 submitted, concur in the filing's content and have authorized the filing.

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16 Dated: February 14, 2018

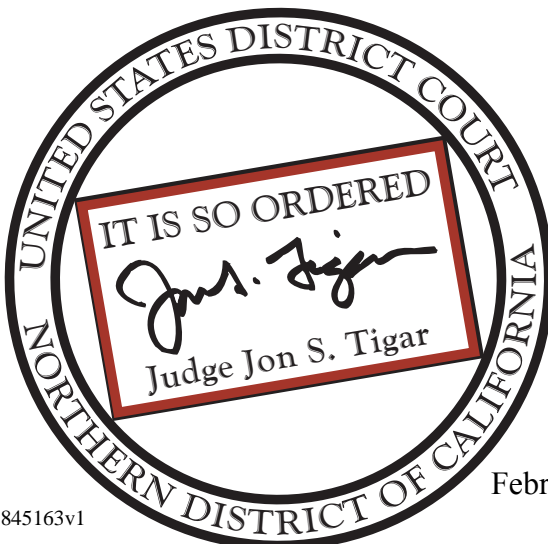
WEITZ & LUXENBERG, P.C.

17 By: //s// Robert Green
18 Robert Green, Esq.
19 Attorney for Plaintiffs

20 Dated: February 14, 2018

MANION GAYNOR & MANNING LLP

21 By: //s// Dustin C. Beckley
22 Dustin C. Beckley, Esq.
23 Brent M. Karren, Esq.
24 Attorneys for Defendant
25 **THE BOEING COMPANY**



26
27
28 February 15, 2018

1 Dated: February 14, 2018

GLAZIER YEE LLP

2 By: //s// Deborah M. Parker
3 Deborah M. Parker, Esq.
4 Attorneys for Defendant
5 **LOCKHEED MARTIN CORPORATION**

6
7 Dated: February 14, 2018

TUCKER ELLIS LLP

8 By: //s// Lance Wilson
9 Lance Wilson, Esq.
10 Attorneys for Defendant
11 **UNITED TECHNOLOGIES CORPORATION**

12
13
14 Dated: February 14, 2018

GORDON & REES LLP

15 By: //s// Michael J. Pietrykowski
16 Michael J. Pietrykowski, Esq.
17 Attorneys for Defendant
18 **THE GOODYEAR TIRE & RUBBER**
19 **COMPANY**

20
21
22 Dated: February 14, 2018

MANION GAYNOR & MANNING LLP

23 By: //s// David Michael Glaspy
24 David Michael Glaspy, Esq.
25 Attorneys for Defendant
26 **ROHR, INC.**

1 Dated: February 14, 2018

LEWIS BRISBOIS BISGAARD & SMITH LLP

2 By: //s// Florence Anne McClain-Meza
3 Florence Anne McClain-Meza, Esq.

4 Attorneys for Defendant

**HENKEL CORPORATION, individually and as
s-i-i to DEXTER CORP., DEXTER HYSOL
AEROSPACE LLC**

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8
9 Dated: February 14, 2018

LEADER & BERKON LLP

10 By: //s// Bobbie Rae Bailey
11 Bobbie Rae Bailey, Esq.

12 Attorneys for Defendant

IMO Industries Inc.

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15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

16 Dated:

17 _____
18 United States District Judge